

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

Latasha Holloway, *et al.*,

Plaintiffs,

v.

City of Virginia Beach, *et al.*,

Defendants

Civil Action No. 2:18-cv-0069

**PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

PLAINTIFFS' EXHIBIT 4

August 26, 2019 Email Disclosing Spencer Reliance Material

Monday, November 4, 2019 at 2:18:28 PM Central Standard Time

Subject: Re: Plaintiffs' Expert Rebuttal Disclosures
Date: Monday, August 26, 2019 at 5:53:18 PM Central Daylight Time
From: Annabelle Harless <aharless@campaignlegalcenter.org>
To: Gerald L. Harris <GLHarris@vbgov.com>, Joseph M. Kurt <jKurt@vbgov.com>, Christopher S. Boynton <CBoynton@vbgov.com>, Gerry Hebert <ghebert@campaignlegalcenter.org>, Danielle Lang <dlang@campaignlegalcenter.org>, Christopher Lamar <CLamar@campaignlegalcenter.org>, Paul Smith <psmith@campaignlegalcenter.org>
Attachments: Fairfax - VAB Illustrative Plan Alternative Plans Block Assignment List.zip, Fairfax - VAB_DisAggr_Analysis.zip, hartman & hidalgo.pdf, spencer_script.R

Counsel,

Attached is the underlying data that Plaintiffs' experts relied upon in conducting their analyses, as provided by Plaintiffs' experts.

Best,

Annabelle Harless

Senior Legal Counsel, Voting Rights & Redistricting
O: 312.561.5508 | [@a_harless](https://twitter.com/a_harless)
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73 W. Monroe St., Suite 302
Chicago, IL 60603
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From: Annabelle Harless <aharless@campaignlegalcenter.org>
Date: Monday, August 26, 2019 at 5:45 PM
To: "Gerald L. Harris" <GLHarris@vbgov.com>, "Joseph M. Kurt" <jKurt@vbgov.com>, "Christopher S. Boynton" <CBoynton@vbgov.com>, Gerry Hebert <ghebert@campaignlegalcenter.org>, Danielle Lang <dlang@campaignlegalcenter.org>, Christopher Lamar <CLamar@campaignlegalcenter.org>, Paul Smith <psmith@campaignlegalcenter.org>
Subject: Plaintiffs' Expert Rebuttal Disclosures

Counsel,

Pursuant to the scheduling order in this case, attached are the disclosures of Plaintiffs' rebuttal expert reports.

In a following email, I will send you the underlying data that our quantitative experts relied upon in conducting their analyses.

Best,

Annabelle Harless

Senior Legal Counsel, Voting Rights & Redistricting

O: 312.561.5508 | @a_harless

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